

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

PURDUE PHARMA L.P., *et al.*

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

AFFIDAVIT AND DISCLOSURE STATEMENT OF R. DAVID KAUFMAN,

ON BEHALF OF BRUNINI, GRANTHAM, GROWER & HEWES, PLLC

STATE OF MISSISSIPPI)
) s.s.:
COUNTY HINDS)

R. David Kaufman, being duly sworn, upon his oath, deposes and says as follows:

1. I am a Member of Brunini, Grantham, Grower & Hewes, PLLC, located at 190 E. Capitol Street, Suite 100, Jackson, MS 39201 (the “**Firm**”).

2. Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the “**Debtors**”), have requested that the Firm provide services to the Debtors, and the Firm has consented to provide such services (the “**Services**”).

3. The Services include, but are not limited to, the following: representation of Purdue Pharma, L.P., Purdue Pharma Inc., and The Purdue Frederick Company Inc. in litigation filed in Mississippi, including the following cases: *State of Mississippi v. Purdue Pharma L.P.*,

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

et al., In the Chancery Court of Hinds County, Mississippi, First Judicial District; Civil Action No. G. 2015-1814; *Gary Carr v. Charles Elliott, M.D., et al.*; in the United States District Court for the Northern District of Mississippi, Oxford Division; Civil Action No. 3:19cv246; and *Julia Greer v. Charles Elliott, M.D., et al.*; in the United States District Court for the Northern District of Mississippi, Oxford Division; Civil Action No. 3:19cv260.

4. The Firm may have performed services in the past and may perform services in the future, in matters unrelated to these chapter 11 cases, for persons that are parties in interest in the Debtors' chapter 11 cases. As part of its customary practice, the Firm is retained in cases, proceedings, and transactions involving many different parties, some of whom may represent or be claimants or employees of the Debtors, or other parties in interest in these chapter 11 cases. The Firm does not perform services for any such person in connection with these chapter 11 cases. In addition, the Firm does not have any relationship with any such person, such person's attorneys, or such person's accountants that would be adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

5. Neither I, nor any principal of, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than principals and regular employees of the Firm.

6. Neither I nor any principal of, or professional employed by the Firm, insofar as I have been able to ascertain, holds or represents any interest materially adverse to the Debtors or their estates with respect to the matters on which the Firm is to be retained.

7. As of the commencement of this chapter 11 case, the Debtors owed the Firm \$ in respect of prepetition services rendered to the Debtors.


8. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of this inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Affidavit.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Affidavit and Disclosure Statement was executed on December 3, 2019, at 10:30 a.m.




Affiant Name

SWORN TO AND SUBSCRIBED before
me this the 3rd day of December, 2019.



Notary Public



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RETENTION QUESTIONNAIRE

TO BE COMPLETED BY PROFESSIONALS EMPLOYED by Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”).

All questions **must** be answered. Please use “none,” “not applicable,” or “N/A,” as appropriate. If more space is needed, please complete on a separate page and attach.

1. Name and address of professional:

R. David Kaufman
Brunini, Grantham, Grower & Hewes, PLLC
190 E. Capitol Street, Suite 100
Jackson, MS 39201

2. Date of retention: December 15, 2015

3. Type of services to be provided: Legal

4. Brief description of services to be provided:

Represent Purdue Pharma, L.P., Purdue Pharma Inc., and The Purdue Frederick Company Inc. in litigation filed in Mississippi, including the following cases: *State of Mississippi v. Purdue Pharma L.P., et al.*, In the Chancery Court of Hinds County, Mississippi, First Judicial District; Civil Action No. G. 2015-1814; *Gary Carr v. Charles Elliott, M.D., et al.*; in the United States District Court for the Northern District of Mississippi, Oxford Division; Civil Action No. 3:19cv246; and *Julia Greer v. Charles*

Elliott, M.D., et al.; in the United States District Court for the Northern District of
Mississippi, Oxford Division; Civil Action No. 3:19cv260.

5. Arrangements for compensation (hourly, contingent, etc.):

Hourly

- (a) Average hourly rate (if applicable):

R. David Kaufman	\$425/hr.
M. Patrick McDowell	\$350/hr.
Michelle Green	\$130/hr.
Jennifer Farmer	\$125/hr.

- (b) Estimated average monthly compensation based on prepetition retention
(if company was employed prepetition):

\$ 4,215.24

6. Prepetition claims against the Debtors held by the company:

Amount of claim: \$0

Date claim arose: September 15, 2019

Nature of claim: for legal services and cash advances for legal services performed

7. Prepetition claims against the Debtors held individually by any member,
associate, or employee of the company:

Name: NONE

Status: _____

Amount of claim: \$ _____

Date claim arose: _____

Nature of claim: _____

8. Disclose the nature and provide a brief description of any interest adverse to the Debtors or to their estates for the matters on which the professional is to be employed:

NONE

9. Disclose whether the professional currently represents any of the Debtors' existing shareholders, including trusts, beneficiaries, companies, affiliates, family members and any similar related parties (together, the "**Shareholder Parties**"), and/or any entity owned or controlled by any Shareholder Party (in each case other than any Debtor), and whether any Shareholder Party or any entity owned or controlled by any Shareholder Party (other than any Debtor) accounted for more than 1% of the professionals' annual revenue for any of the last five years. If so, describe what ethical walls or other protections are in place with regard to the concurrent representations.

NONE

10. Name and title of individual completing this form:

R. David Kaufman, Member

Dated: December 3, 2019.